

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:

James M. Woodard	:	Chapter 13
	:	Case No.: 24-10269-amc
Debtor(s)	:	

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**MOTION TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS AND  
ENCUMBRANCES**

Debtor, James M. Woodard, by and through Attorney Brad J. Sadek, hereby moves this Honorable Court to Sell his Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof aver the following:

1. Debtors filed the Chapter 13 Bankruptcy Petition on January 30, 2024.
2. The subject real property is located at 5214 Jefferson Street, Philadelphia PA 19131 (hereinafter referred to as “the property”) was inherited and is jointly-owned by James M. Woodard and his sister, Angela Woodard (hereinafter referred to as “the Sellers”).
3. The Sellers believe it to be in their best financial interest to sell the property.
4. In furtherance of the sale, the Sellers retained the services of Watson Saintsulne, President & Senior Acquisition Manager at The Covenant Real Estate Investment Group, LLC.
5. On or about March 20, 2024, The Sellers entered into an Agreement of Sale of the property in the amount of \$60,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
6. The settlement date for the sale of the subject property is to be determined.
7. The buyer, The Covenant Real Estate Investment Group, LLC, are not insiders of the Sellers and the sale represents an arms-length transaction between the parties, made without fraud and/or collusion.

8. The proceeds of the sale shall be distributed equally to the Sellers with each party receiving an estimated amount of Thirty Thousand Dollars (\$30,000.00).
9. The Debtor's unsecured creditors are expected to receive an estimated \$30,000.00, which shall be immediately cured by the debtors with proceeds from the sale.

**WHEREFORE**, Debtor, by and through the undersigned counsel, respectfully request this Honorable Court to enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: April 9, 2024

/s/Brad J. Sadek, Esq

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